

January 4, 2013

Linda Brolin, Environmental Engineer
U.S. Environmental Protection Agency
5 Post Office Square, Suite 1100
Mail Code: OES05-1
Boston, MA 02109

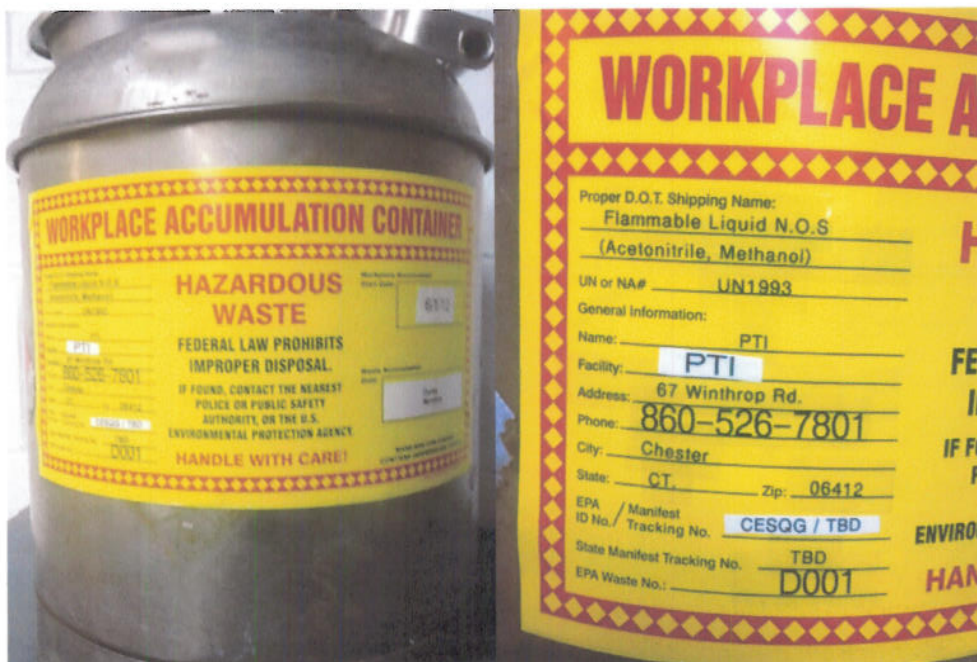
Dear Ms. Brolin:

RE: Response to NOV dated 12/14/12 regarding General Standards of Hazardous Waste

All violations noted in the NOV letter dated 12/14/12 were corrected within 24 hours of the inspection conducted by you on June 27, 2012. The specifics as to how each violation was corrected are explained below.

1. **Failure to adequately label containers of hazardous waste with the words "Hazardous Waste" and a description of the contents, such as the chemical name, as required by 40 CFR 262.32 and RCSA 22a-449(c) – 102(a)**

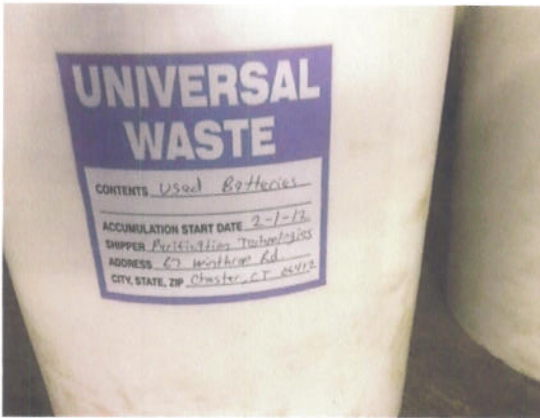
The 5-gallon container used for satellite accumulation outside of the main lab did contain a label with the words "Hazardous Waste, Flammable Liquid." The label was modified at the time of inspection (6/27/2012) to include a more detailed description of the waste. See pictures below, previously sent to you on June 29th.



All satellite accumulation containers in the facility are labeled with the words "Hazardous Waste" with a description of the contents, such as chemical name, in accordance with RCSA 22a – 449(c) – 102(a).

2. Failure to label or mark containers of universal waste batteries with any of the following phrases: "Universal Waste – Battery(ies)", "Waste Battery(ies)", or "Used Battery(ies)", as required by 40 CFR 273.5 and RCMA 22a-449(c) 113.

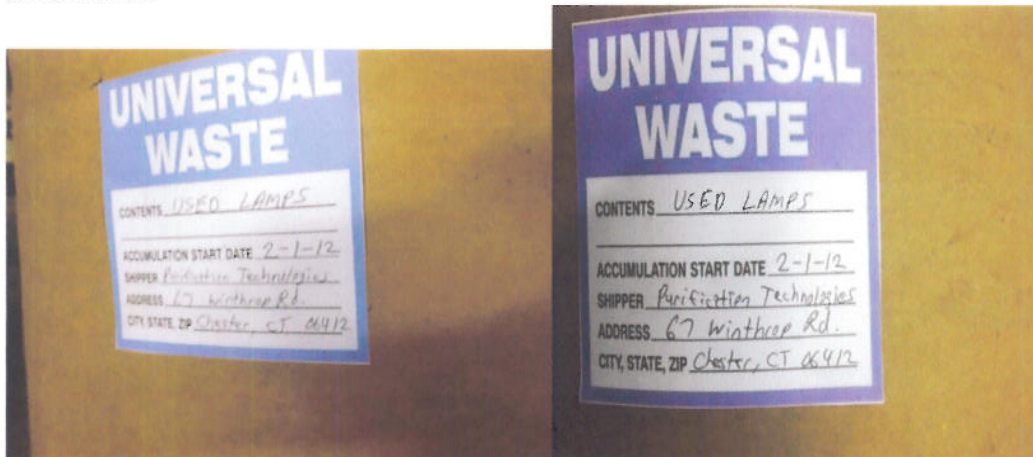
At the time of inspection the inspector noticed a 5-gallon container containing two nickel cadmium batteries, with no label and no date. On June 27th 2012 after the inspector left a new label with the accumulation start date was affixed to the container containing the words "Universal Waste" and "Used Batteries". See picture below which was previously sent to you on June 29th.



All Universal waste batteries in the facility are labeled with one of the following phrases: "Universal Waste – Battery(ies)", "Waste Battery(ies)", "Used Battery(ies)", in accordance with RCMA 22a-449(c) – 113.

3. Failure to date universal waste lamps or containers of universal waste lamps, as required by 40 CFR 273.5 and RCMA 22a-449(c) -113

One four-ft cardboard box labeled "used lamps" but with no date and one three-ft cardboard box, labeled "used lamps" but with no date was identified during the inspection. Both of these containers were relabeled with the proper accumulation start date after the inspectors left on June 27, 2012. See the pictures below of the two container's labels with accumulation dates, which were previously sent to you on June 29th.



All universal waste lamps or containers in the facility are dated with the date it becomes a waste or was received to demonstrate the length of time that the universal waste has been accumulated, in accordance with RCMA 22a-449(c)-113.

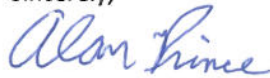
4. Failure to date universal waste batteries or containers of universal waste batteries, as required by 40 CFR 273.5 and RCSA 22a-449(c)-113.

As mentioned in violation #2, one 5-gallon container of used batteries was identified without a label and date at the time of the inspection. This container was labeled used batteries and was labeled with an accumulation start date after the inspectors left on June 27, 2012. See the picture identified with violation #2. All universal waste batteries or containers of universal waste batteries in the facility are dated with the date it becomes a waste or was received to demonstrate the length of time that the universal waste has been accumulated, in accordance with RCSA 22a-449(c)-113.

We have also reviewed our current waste management program with our environmental consultant, Aquair Environmental Consultants, LLC (AEC). Bill Williams, PE of AEC, inspected our facility on January 4, 2013 and indicated we were in compliance with the Hazardous Waste Regulations applicable to our CESQG status and Universal Waste management.

Please do not hesitate to contact me at 860-526-7801 if you have any questions or require any additional information.

Sincerely,



Alan Prince
Operations Manager

